IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION



JUDGE MORAN

MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COURT

MAGISTRATE JUDGE ASHMAN TERRELL CANTRELL C 5442 Plaintiff, V. NO. CHICAGO POLICE OFFICER PARHAM, STAR #18619. CHICAGO POLICE OFFICER SMITH, STAR #13941, CHICAGO POLICE OFFICER WESTON, STAR #17706, CHICAGO POLICE OFFICER SWEENEY STAR #13177, and the CITY OF CHICAGO Defendants. AUG 0 1 2002

NOW COMES the Plaintiff TERRELL CANTRELL by his undersigned attorneys and complains against Defendants and alleges as follows:

JURISDICTION

COMPLAINT

1. The jurisdiction of the Court is invoked pursuant to the Civil Rights Act, 42 U.S.C. Section 1983, 1981 and 1985; 28 U.S.C. Section 1331 and Section 1343(a); the Constitution of the United States; and pendent jurisdiction as provided under U.S.C. 1367(a). The amount in controversy exceeds \$10,000.00, exclusive of cost and interest against each Defendant.

PARTIES

- 2. Plaintiff TERRELL CANTRELL is a citizen of the United States.
- 3. Defendant PARHAM, # 18619, was at all times material to this Complaint a Chicago Police Officer. He is sued individually.
- 4. Defendant SMITH, # 13941, was at all times material to this Complaint a Chicago Police Officer. He is sued individually.
- 5. Defendant WESTON, # 17706, was at all times material to this Complaint a Chicago Police Officer. He is sued individually.
- 6. Defendant SWEENEY #13171, was at all times material to this Complaint a Chicago Police Officer. She is sued individually.
- 7. Defendant CITY OF CHICAGO is a municipal corporation duly incorporated under the laws of the State of Illinois and the City of Chicago and is the employer and principal of defendant police officers Parham, Smith, Weston, and Sweeney.
- All Defendants were at all times material to this Complaint acting under color of law.

STATEMENT OF FACTS

- 9. On October 12, 2000, Plaintiff Terrell Cantrell resided at 862 North Sedwick, #307, in the City of Chicago, County of Cook, State of Illinois.
- 10. On October 12, 2000, at approximately 2:15 p.m., Chicago police officers arrested the Plaintiff without probable cause pursuant to a knowingly false case report signed by Defendant Officers Parham and Smith and which was adopted by Defendants Weston and Sweeney as true and correct. Each defendant knew there was no probable cause to arrest the plaintiff.
- 11. In their case report, Defendants Parham and Smith falsely stated they saw the Plaintiff at10: 35 p.m. on October 10, 2000, in the vicinity of Apartment 710 at 624 West Division, Chicago, Illinois. Defendants Parham and Smith intentionally and falsely stated that the Plaintiff threw a plastic bag into the open doorway of Apartment 710 and then escaped up the eastern stairwell at 624 West Division.

- 12. Defendants Parham and Smith's report stated that the plastic bag was recovered from Apartment 710. The report alleged that the bag contained a handgun, a plastic bag containing what defendants Parham and Smith thought was cocaine, and \$1234.00 in U.S. currency.
- 13. Defendants Parham and Smith also falsely wrote in their report that a Denise Webb in Apartment 710 at 624 W. Division Street told the police that the man who threw the plastic bag was Terrell Cantrell.
- 14. Defendants Parham and Smith communicated, or caused to be communicated, a false story to the Cook County State's Attorney that Plaintiff possessed a gun and controlled substances, knowing and intending that such information would be relied upon by the State's Attorney as the factual basis for the felony charges against the Plaintiff.
- 15. Defendants Weston and Sweeney were present at the scene on October 10, 2000 and knew that Defendants Parham and Smith did not see the Plaintiff at Apartment 710, 624 W. Division Street.
- 16. Based both on the above false allegations made by Defendants Parham and Smith, and the fact that Defendant Parham falsely testified before the Grand Jury, the Plaintiff was indicted on November 3, 2000, on charges of armed violence, possession of a controlled substance with intent to deliver, aggravated unlawful use of a weapon, and unlawful use of a weapon by a felon. A bond was set in the amount of \$175,000.00.
- 17. Defendants Sweeney and Weston knew that Defendants Parham and Smith intended to have the Plaintiff falsely arrested and that Defendants Parham and Smith did, in fact, cause Plaintiff to be charged with aggravated unlawful use of a weapon and possession of a controlled substance with intent to deliver.
- 18. Defendants Sweeney and Weston knew that they had information which, if communicated to the State's Attorney at any point during the pendency of the prosecution, would have resulted in the refusal to bring criminal charges against the Plaintiff and/or the dismissal of all criminal charges and the release of Plaintiff.
- 19. Defendants Sweeney and Weston knew and intended that their withholding information would result in the initiation of and continued malicious prosecution of Plaintiff.

- 20. Defendants Sweeney and Weston's withholding of information caused the false arrest and malicious prosecution to be initiated and to continue.
- 21. On January 24, 2002, after a two-day bench trial, the Plaintiff was acquitted of all charges. Plaintiff was released from custody the evening of January 24, 2002.
- 22. For over one and a half years, all Defendants continued to lie and withhold information from the prosecutors and the court about the facts of the case.
- 23. Defendants Parham, Smith, Sweeney and Weston falsely testified at trial as to the Plaintiff's possession of a gun and drugs.
- 24. Defendants Parham, Smith, Sweeney and Weston knew their testimony was false and intended that their testimony would result in Plaintiff's conviction.
- 25. All Defendants knew that such an arrest, detention, and prosecution could only be made based upon probable cause, and a reasonable officer in each of their positions would have known that there was not probable cause for the arrest, detention or prosecution of the Plaintiff.
- 26. All Defendants had a duty to determine whether there was probable cause to justify the arrest and detention of Plaintiff, had a duty to act to prevent the prosecution, had a duty to testify truthfully in their reports and in court, had opportunities to act to prevent the prosecution and prevent the injuries and harm to Plaintiff, yet failed to take action to prevent the prosecution and prevent the injuries and harm to Plaintiff and in fact, engaged in specific acts and omissions, as more fully set forth above, calculated and intended to result in the continued prosecution of Plaintiff.
- 27. Defendants reached a meeting of the minds and agreed to cause Plaintiff to be charged with felonies, to falsify reports, to withhold information which would have resulted in the dismissal of criminal charges and the release of Plaintiff, and to testify falsely in court in order to cover up the misconduct of Defendants as more fully set above.
- 28. Defendants, acting both individually, jointly, and in conspiracy, directly and proximately caused the false arrest, pretrial detention and malicious prosecution of Plaintiff by the misconduct and unlawful acts set forth more fully above.
- 29. The acts and omissions of Defendants, as set forth more fully above, were wanton and willful.

- 30. The Defendants' false arrest and malicious prosecution of Plaintiff directly resulted in Plaintiff's damages as set forth in more detail below.
- 31. As a result of the false allegations made by Defendants Parham, Smith, Sweeney and Weston, the Plaintiff was in custody from October 12, 2000, until January 24, 2002, a total of 569 days.
- 32. While in custody in Division 5 of Cook County Jail, Illinois, the Plaintiff contracted three separate eye infections and additional medical problems during his unlawful imprisonment.
- 33. Moreover, the Plaintiff has been severely traumatized as a result of Defendants' actions. The Plaintiff suffered a loss of his liberty for a crime he did not commit, experienced mental distress and anguish, experienced a lack of enjoyment in life, and was prevented from going about his regular business during his period in custody.

COUNTI

(Plaintiff's Claim for False Arrest and Imprisonment Section 1983 Defendants Parham, Smith, Weston and Sweeney)

- 34. The plaintiff realleges paragraphs 1-33 with the same force and effect as if fully set forth herein.
- 35. Defendants Parham and Smith prepared police reports which falsely identified the Plaintiff as the suspect who fled from Defendants Parham and Smith. Defendants Sweeney and Weston deliberately failed to contradict or disavow the reports. On the basis of these false allegations the Plaintiff was illegally arrested without probable cause. The Plaintiff was also indicted on the basis of Defendants Parham's and Smith's false allegations, including Defendant Parham's testimony before the Grand Jury, which resulted in Plaintiff's indictment. As a result of Defendants Parham's and Smith's false allegations and resulting illegal arrest without probable cause, the Plaintiff was detained in custody and held continuously in custody from October 12, 2000, until his release on January 24, 2002. These actions by the Defendants constitute false arrest and

imprisonment under the Fourteenth Amendment and the Fourth Amendment and right to be free of unreasonable seizures and are actionable under 42 U.S.C. Section 1983.

WHEREFORE, the Plaintiff requests that this Court award him substantial money damages in excess of \$50,000.00 to compensate for the injuries caused by the Defendants' intentional or reckless, and illegal acts; and since Defendants' actions were malicious, willful and/or wanton Plaintiff demands in excess of \$50,000.00 in punitive damages plus the costs of this action and attorney fees.

COUNT II

(Plaintiff's Claim for 1983 Civil Conspiracy Defendants Parham, Smith, Weston, and Sweeney)

- 36. The plaintiff realleges paragraphs 1-35 with the same force and effect as if fully set forth herein.
- 37. Defendants together reached an understanding, engaged in a course of conduct, and otherwise jointly acted and/or conspired among and between themselves to falsely arrest and maliciously prosecute Plaintiff in violation of the Fourth and Fourteenth Amendments in order to cover-up the unjustified arrest of Plaintiff by Chicago police officers.
- 38. In furtherance of this conspiracy, the Defendants named above committed the overt acts set forth above, including, but not limited to, the wrongful arrest, incarceration, charging and malicious prosecution of Plaintiff; the creation and filing of false, fabricated, and incomplete statements and reports; the withholding of information which would have led to the dismissal of criminal charges and the release of Plaintiff; and the giving of false testimony.
- 39. Said conspiracy and overt acts were and are continuing in nature.
- 40. Defendants' acts as set forth above in acting jointly and/or conspiring together to maliciously prosecute Plaintiff were wanton and willful and constitute the tort of conspiracy.

41. This conspiracy proximately caused the injuries to the Plaintiff set forth above.

WHEREFORE, the Plaintiff requests that this Court award him substantial money damages in excess of \$50,000.00 to compensate for the injuries caused by the Defendants' intentional or reckless, and illegal acts; and since Defendants' actions were malicious, willful and/or wanton Plaintiff demands in excess of \$50,000.00 in punitive damages plus the costs of this action and attorney fees.

COUNT III

(Plaintiff's 1983 Claim for Violation of Due Process and Right to a Fair Trial Defendants Smith, Parham, Weston and Sweeney)

- 42. The Plaintiff realleges paragraphs 1-41 with the same force and effect as if fully set forth herein.
- 43. Defendants knowingly and intentionally deprived the Plaintiff of due process of law under the Fourteenth Amendment by preparing false case reports, by Defendant Parham testifying falsely at the Grand Jury, and by all Defendants falsely testifying at the Plaintiff's trial.

WHEREFORE, the Plaintiff requests that this Court award him substantial money damages in excess of \$50,000.00 to compensate for the injuries caused by the Defendants' intentional or reckless, and illegal acts; and since Defendants' actions were malicious, willful and/or wanton Plaintiff demands in excess of \$50,000.00 in punitive damages plus the costs of this action and attorney fees.

COUNT IV

(Plaintiff's Federal Claim Against Defendants Parham, Smith, Weston and Sweeney for Violation of Due Process and Malicious Prosecution)

- 44. The Plaintiff realleges paragraphs 1-43 with the same force and effect as if fully set forth herein.
- 45. The Defendants knowingly and falsely testified at the plaintiff's trial and Defendant Parham maliciously and without probable cause testified falsely at the Grand Jury that indicted the Plaintiff.
- 46. The Defendant's false testimony was done intentionally and knowingly with the aim of having the Plaintiff falsely convicted of crimes which he didn't commit.
- 47. As a result of Defendant Parham's false testimony before the Grand Jury, the plaintiff was falsely incarcerated for a substantial amount of time.
- 48. The Defendants knowingly and intentionally violated the Plaintiff's right to a fair trial, fundamental fairness and due process under the Fifth, Sixth and Fourteenth Amendment.

WHEREFORE, the Plaintiff requests that this Court award him substantial money damages in excess of \$50,000.00 to compensate for the injuries caused by the Defendants' intentional or reckless and illegal acts; and since Defendant's actions were malicious, willful and/or wanton Plaintiff demands in excess of \$50,000 in punitive damages plus the costs of this action and attorney fees.

COUNT V

(Plaintiff's Pendent State Claim for Malicious Prosecution Defendants Parham, Smith, Weston and Sweeney)

- 49. The Plaintiff realleges paragraphs 1-48 with the same force and effect as if fully set forth herein.
- 50. Defendants individually, jointly, and in conspiracy, maliciously and without probable cause caused the false charging and prosecution of Plaintiff for the fabricated charges of aggravated unlawful use of a weapon, possession of a controlled substance and possession of a controlled substance with intent to deliver; and Defendants conspired to prepare a case report which falsely identified the Plaintiff as the suspect who fled from Defendants Parham, Smith, Sweeney and Weston.
- 51. The prosecution of Plaintiff was terminated in his favor.
- 52. As a result of the malicious prosecution, Plaintiff was deprived of liberty as set forth above.
- 53. The actions of Defendants in maliciously prosecuting Plaintiff constituted a violation of his rights under Illinois law to be free from malicious prosecution without probable cause and caused the injuries set forth above.
- 54. Defendants' actions in maliciously prosecuting Plaintiff were willful and wanton.

WHEREFORE, the Plaintiff demands judgment against all Defendants for compensatory damages in an amount in excess of \$50,000.00, plus the costs of this action and such other relief as this Court deems equitable and just.

COUNT VI

(Respondeat Superior Claim - Defendant City of Chicago)

- 55. The plaintiff realleges paragraphs 1-54 with the same force and effect as if fully set forth herein.
- 56. The aforesaid acts and state law violations of Defendants Parham, Smith, Weston, and Sweeney, as set forth above, were performed in the scope of their employment as Chicago police officers, were willful and wanton, and therefore the Defendant City of Chicago as principal is liable for the actions of its agents, under the doctrine of *respondeat superior* for the violations of state law.

WHEREFORE, the Plaintiff demands judgement against the City of Chicago in the amounts sought against the individual Defendants in his state claim as set forth in Count V.

COUNT VII

(745 ILCS 10/9 102 - Defendant City of Chicago)

- 57. The Plaintiff realleges paragraphs 1-56.
- 58. Defendant City of Chicago is the employer of the individual Defendants.
- 59. Defendants Parham, Smith, Weston, and Sweeney committed the acts alleged above under color of law and in the scope of their employment as employees of the City of Chicago.

WHEREFORE, should Defendants Parham ,Smith, Weston, and Sweeney be found liable on one or more of the claims set forth above, Plaintiff demands that, pursuant to 745 ILCS 10/9-102, the Defendant City of Chicago be found liable for any judgements Plaintiff obtains thereon against said Defendants as well as for all attorney fees and costs.

Attorney for Plaintiff

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Attorney for Plaintiff Michael Deutsch Peoples Law Office 1180 N. Milwaukee

Chicago, II. 60622 773-235-0070

JS 44 (Rev. 12/96)



CIVIL COVER SHEET

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NORTHERN DISTRICT OF ILLINOIS

In the Matter of

JUDGE MORAN

TERRELL CANTRELL, Plaintiff MAGISTRATE JUDGE ASHMAN Case Number:

CHICAGO POLICE OFFICER PARHAM, Star NO. 18619,
CITY OF CHICAGO, et al
APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNE

YES

DESIGNATED AS LOCAL COUNSEL?

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